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Attorneys for Defendant
DAVID NUNN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID NUNN

Defendant.

Case No. 6:20-PO-00742-HBK

**JOINT MOTION TO EXTEND MOTION
SCHEDULE; [PROPOSED ORDER]**

MOTION

The parties, through their respective counsel, Sean O. Anderson, Yosemite National Park Legal Officer, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender, counsel for the defendant, David Nunn, hereby jointly move this Court to extend the instant motion schedule, defendant's opening brief to be due on April 25, 2021.

Mr. Nunn was arraigned on January 12, 2021 before the Honorable Helena Barch-Kuchta. The government timely provided initial discovery. At the status conference on March 9, 2021, Judge Barch-Kuchta set a motion schedule, defendant's opening brief due April 6, 2021. On April 4, 2021, Defense counsel moved the court to extend the deadline for the opening brief to allow compliance and review of an additional discovery request. The government provided the additional discovery on April 14, 2021. Because the instant motion involves a complex analysis of administrative law and procedure, defense counsel again respectfully requests that the deadline of

1 the initial filing be extended until April 25, 2021 to complete legal research in light of the newly
2 provided discovery. The government does not object.

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4 Respectfully submitted,

5 Dated: April 20, 2021

/s/ Sean O. Anderson
SEAN O. ANDERSON
Legal Officer Yosemite National Park

6 Dated: April 20, 2021

HEATHER E. WILLIAMS
Federal Defender

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9 /s/ Benjamin A. Gerson
BENJAMIN A. GERSON
Assistant Federal Defender
Attorney for Defendant
David Nunn

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12 **ORDER**

13 **GOOD CAUSE APPEARING**, the joint motion to extend the deadline for submission
14 of the defendant's opening brief from April 20, 2021 to April 25, 2021 is granted.

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17 Dated: April _____, 2021

HON. HELENA M. BARCH-KUCHTA
United States Magistrate Judge